

YES 3-27-84  
Code A

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

**DEPARTMENT OF NATURAL RESOURCES**

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

RONALD O. SKOOG, Director

February 14, 1984

Hazardous Waste Division  
1120 W. State Fair Ave.  
Detroit, MI 48203

NATURAL RESOURCES COMMISSION  
THOMAS J. ANDERSON  
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JACOB A. HOEFER  
STEPHEN F. MONSMA  
HILARY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELEY

Mr. Robert Miller, Plant Mgr.  
Chrysler Corporation  
Warren Stamping Plant  
22800 Mound Road  
Warren, MI 48901

EPA ID No: MID 980700868

Dear Mr. Miller:

This letter is to acknowledge receipt of your letter dated February 1, 1984, indicating your compliance program for RCRA deficiencies cited during my inspection on January 12, 1984. The following comments are offered relating to my deficiency letter of January 12, 1984 and your response.

1. I consider your response addressing items 2 and 3 acceptable at this time and will evaluate the adequacy of your program during future inspections.
2. As a point of clarification, relating to item 1, your facility is not considered to be a small quantity generator therefore, conformance to 40 CFR 262.42 is required.
3. It is necessary to perform an annual training review as required in 40 CFR 265.16. The last training was conducted May 7, 1982. Your response that a training review will be performed in May of this year is unacceptable. You are requested to perform this review no later than March 9, 1984 and provide documentation that the training was completed.
4. It is the generator's responsibility, not the disposal facility, to determine the hazardous nature of a waste. The disposal facility must verify the waste shipped is indeed the waste declared on the manifest. All wastes generated by your facility must be evaluated in accordance with 40 CFR 262.40. All test results and analyses resulting from this evaluation must be maintained. Your facility did not have this documentation available and therefore was and still is in violation of the requirements outlined in item 5. You are requested

Robert Miller  
February 14, 1984  
page 2

to provide this documentation by February 27, 1984.

You are requested to respond as outlined in this letter. If you have any questions regarding this matter, please contact me at (313) 368-3335.

Sincerely,  
HAZARDOUS WASTE DIVISION

A handwritten signature in cursive script, appearing to read "Larry AuBuchon".

Larry AuBuchon  
DETROIT DISTRICT OFFICE

LA:pf

cc: EPA



February 1, 1984

Larry AuBuchon, Water Quality Specialist  
Hazardous Waste Division  
1120 W. State Fair Ave.  
Detroit, Michigan 48203

Reference: Your letter dated January 12, 1984  
(RCRA Inspection Report - Chrysler Warren Stamping Plant,  
22800 Mound Road, Warren, Michigan - EPA ID No. MID 980700868)

Dear Mr. AuBuchon:

In response to your letter I should like to address each violation listed.

1. Failure to file an exception report for hazardous waste shipment of November 11, 1983.

Comment: A shipment of waste paint was sent to Chem-Met for disposal. Chem-Met analyzed and accepted the waste. As can be noted by the attached memo, Chem-Met sent a Generator 2 copy of the manifest back to Warren Stamping Plant but the copy was lost in the mail and subsequently returned to the sender. An inquiry as to the whereabouts of the copy was made by Mr. Lassen prior to the inspection. A duplicate manifest was again sent to Warren Stamping on January 12, 1984. It must further be noted that per Mrs. Marta Fisher, of D.N.R. - Lansing, Warren Stamping is a small generator and therefore not required to notify the E.P.A. Administrator of small shipments.

2. Container of waste paint and thinner in paint room was not labeled "Hazardous Wastes".

Comment: Waste paint container was subsequently labeled and grounded.

3. Waste container in paint room was not closed.

Comment: The container was equipped with a funnel. The funnel was removed and the top secured.

4. Annual training review was not performed since last May.

Comment: Training review will commence again in May.

- continued -

5. Test results and analyses were not available.

Comment: The accepting vendor analyzes all hazardous waste prior to acceptance of a shipment. After acceptance, the Generator 2 copy of the manifest is sent back to the Generator, in this case, Warren Stamping. This copy is kept on file. Since the Generator 2 copy was lost in the mail, and an inquiry was made within the allowable time frame, Warren Stamping should be considered blameless for this infraction.

It is my sincere hope that this reply will serve to satisfy the requirements of the aforementioned letter.

CHRYSLER CORPORATION  
WARREN STAMPING PLANT

*Robert R. Miller JDB*

ROBERT R. MILLER  
Plant Manager

Attachments

*Charlie Butts*